

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

YOLANDA R. EFFINGER

Plaintiff,

v.

WINN DIXIE MONTGOMERY, INC.

Defendant.

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Case No. 2:07-CV-657-ID-TFM

**MOTION FOR PROTECTIVE ORDER ON PLAINTIFF'S DEPOSITION**

Now comes Plaintiff, by and through undersigned counsel and moves this court to issue a protective order pursuant to Federal Rule of Civil Procedure 26 (c) temporarily staying plaintiff's deposition, and for grounds for this motion states as follows:

1. That equal protection of the law as guaranteed by the 14<sup>th</sup> Amendment to the U. S. Constitution requires that she not be forced to give her deposition until defendant is compelled to properly and fully participate in mandatory discovery.

2. In support of this motion, plaintiff attaches her memorandum in support.

WHEREFORE, plaintiff prays that a protective order be issued temporarily staying her deposition until this court hears her discovery motions herein referenced.

This 7<sup>th</sup> day of December, 2007

/s/ Ronald B. Hatcher

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Ronald B. Hatcher  
Attorney for Plaintiff  
HAT002  
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(404) 526-9440

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**Proof of Service**

I hereby certify that a copy of the foregoing Motion for Protective Order Staying Plaintiff's Deposition was served on Defendant's Counsel, Randall Morgan, Esq., P. O. Box 116, Montgomery, AL 36101, by electronic mail on December 7, 2007. and by regular U. S. Mail on December 7, 2007.

/s/ Ronald B. Hatcher

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